

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION**

FORTRES GRAND CORPORATION, an Indiana Corporation,)	
)	
Plaintiff,)	
)	Civil Action No. 3:12 CV 535
v.)	
)	Judge Philip P. Simon
WARNER BROS. ENTERTAINMENT INC., a Delaware corporation,)	
)	
Defendant.)	

**AGREED MOTION FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE PLEAD**

Defendant Warner Bros. Entertainment Inc. (“Warner”), by its attorneys, respectfully moves for an extension of time to answer or otherwise plead pursuant to Local Rule 6-1(a). Plaintiff Fortres Grand Corporation (“Fortres”) has agreed to extend the time for Warner to answer to and including December 10, 2012. In support of this motion, Warner states as follows:

1. Fortres filed its Complaint on September 19, 2012.
2. Fortres served the summons and complaint on Warner on September 25, 2012.
3. Warner’s responsive pleading was originally due on October 16, 2012.
4. Counsel for Warner conferred with counsel for Fortres, and on October 12, 2012, counsel for Fortres agreed to Warner’s initial request for an extension of time to answer.
5. Pursuant to Local Rule 6-1(b), on October 22, 2012, Warner filed a notice extending the time to answer or otherwise plead to and including November 13, 2012.
6. Because the storms in New York in October temporarily shut down the office where some of Warner’s attorneys work, Warner requested a second extension of time, to and including November 30, 2012, to which Fortres’ counsel agreed. Warner moved the Court for such an extension, which the Court granted on November 9, 2012.

7. The DVD of *The Dark Knight Rises*, the movie at issue in this case, will not be released until the first week of December 2012. In order to allow Warner to attach the DVD to its Motion to Dismiss and to make appropriate references to the movie in its motion, Warner requested a third extension of time from Fortress, to an including December 10, 2012, and Fortress agreed.

8. This extension is sought for good cause and not for purposes of delay.

WHEREFORE, Defendant Warner hereby moves the Court for an order extending its time to answer or otherwise plead to and including December 10, 2012.

Respectfully submitted,

WARNER BROS. ENTERTAINMENT INC.,
a Delaware corporation

By /s/ Keith V. Porapaiboon
One of Their Attorneys

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Dated: November 27, 2012

CERTIFICATE OF SERVICE

I, Keith V. Porapaiboon, an attorney, hereby certify that I caused the foregoing document to be served upon the counsel of record, including the counsel listed below by utilizing the CM/ECF filing system on November 27, 2012.

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